

December 19, 2017

Ms. Marlene Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: NOTICE OF EX PARTE PS Docket 15-91 Improving Wireless Emergency Alerts

Dear Secretary Dortch:

On December 18, 2017, emergency management officials and government agencies met to discuss the ongoing work with the Wireless Emergency Alert (WEA) system upgrades. This included:

- representatives from the Harris County Office of Homeland Security & Emergency Management (HCOHSEM),
- representatives from the New York City Emergency Management Department (NYCEM),
- Association of Public Safety Communications Officials (APCO),
- the National Weather Service (NWS),
- CTIA, and
- the wireless industry.

HCOHSEM appreciates the ongoing dialogue on improving WEA with CTIA and its member companies from the industry. Despite the open dialogue, HCOHSEM once again expressed the urgency to act now on geo-targeting upgrades to the WEA system. HCOHSEM reiterated that the existing level of geo-targeting is not sufficient as clearly demonstrated by the county's use of WEA during Hurricane Harvey, which required a countywide message to go out because of the lack of granular geo-targeting available.

HCOHSEM expressed that it continues to support limiting the granularity of messages delivered within a polygon to $1/10^{th}$ of a mile as proposed by CSRIC reports, which have studied this issue extensively since the convening of CSRIC IV.

During these conversations, HCOHSEM expressed that much work remains to be done to advance WEA geo-fencing. Emergency management partners would like to see continued



improvements in WEA geo-targeting by incorporating both network-level improvements (e.g., cell sectorization) and device-based based improvements (e.g., utilizing the handset's GPS) moving forward.

HCOHSEM continues to strongly support these enhancements and encourages the Commission to adopt an implementation timeline consistent with other WEA improvements that are expected to come online in 2019. HCOHSEM would like to see milestones – software updates to existing and new phones – no later than May 2019.

A 36-month implementation timeline is simply too long given the current and future threat environment. Scenarios like Hurricanes Harvey and Maria, the Las Vegas Shootings, and the California Wildfires tragically highlight the immediate need for action on WEA.

While geo-targeting issues were the main focus of the recent discussion, HCOHSEM will continue to encourage other WEA enhancements requested by the public safety community such as multimedia capabilities in WEA messages; many-to-one data collection; multilingual messaging capabilities to serve the entire community; and WEA message archiving.

A copy of this letter will be filed with the FCC, via ECFS.

Sincerely,

Francisco Sanchez

Public Information Officer/Liaison

Harris County Office of Homeland Security & Emergency Management



Conversation Participants

- **HCOHSEM Participant** Francisco Sanchez, Public Information Officer/Liaison to the County Judge
- NYCEM Participants Benjamin J. Krakauer, Assistant Commissioner for Strategy and Program Development, Rachel Sulaymanov, Director of Intergovernmental Affairs, Robert DeVoogd, Esq., Agency Counsel
- **APCO Participants** Jeff Cohen, Mark Reddish
- National Weather Service Participant Mike Gerber, Hugh Schratwieser
- FCC Participants Lisa Fowlkes, Nicole McGinnis, Megan Henry, James Wiley, Rasoul Safavian, Anjali Singh
- CTIA Participants Matt Gerst, Assistant Vice President, Regulatory Affairs
- Industry Participants Mike Tan (AT&T), Rob Kubik (Samsung), Ray Rothermel (Sprint), Shellie Blakeney (T-Mobile), Eric Hagerson (T-Mobile), Grant Spellmeyer (USCellular), Bill Tortoriello (USCellular), Rob Morse (Verizon), Farrokh Khatibi (Qualcomm)